

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In Re:)
)
Deborah Lynn Morris Heacock) Case No. 14-41359-399
) Chapter 13

Debtor.

DEBTORS' OBJECTION TO CLAIM 11-1 FILED BY
BANK OF AMERICA, N.A.

Comes now Kimber H. Baro, Attorney for Debtor, and for her objection to claim states as follows:

The secured claim 11-1 filed by Bank of America, N.A. in the sum of \$105,082.27 should be allowed as filed but no payments made by the Trustee because the debtor is surrendering the real estate at 12255 Benham Road, St. Louis, MO 63138. An amended claim may be filed for any deficiency balance after foreclosure.

WHEREFORE, Debtor prays the Court will enter its order sustaining this objection.

NOTICE OF FILING OF OBJECTION TO CLAIM

PLEASE TAKE NOTICE that the Debtor has filed an objection to your claim. Any responsive pleading in opposition to the above objection must be filed in writing with the Clerk of the United States Bankruptcy Court, 111 South 10th Street, 4th Floor, St. Louis, Missouri 63102, and with the Chapter 13 Trustee at the address indicated below, within 21 days of the date of this Notice. If no responsive pleading is filed, the objection may be sustained and the claim disallowed or modified without further notice to any party upon submission of an order from the Debtor. If a response is filed, this matter will be set for hearing upon subsequent notice.

The undersigned hereby certifies that a copy of the foregoing was served upon the following parties by either electronic mail through the Court's ECF system or by regular mail on June 24, 2014.

Bublitz & Baro, LLC

/s/Kimber H. Baro 33690MO

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Chapter 13 Trustee
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Bank of America, N.A.
Bankruptcy Department
P.O. Box 26012
NC4-105-02-99
Greensboro, NC 27420

/s/ Kimber H. Baro